

**Counsel at end of document**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

DEPARTMENT OF FAIR EMPLOYMENT  
AND HOUSING, an agency of the State of  
California,

Plaintiff,

VS.

LUCENT TECHNOLOGIES, INC., and; DOES ONE through THIRTY, Inclusive,

**Defendants.**

STEVEN J. CARAUDDO,

Real Party in Interest.

**Case No. C 07-3747 PJH**

**FURTHER STIPULATION AND  
[PROPOSED] ORDER RE MEDIATION**

## STIPULATION

Defendant Lucent Technologies, Inc., plaintiff Department of Fair Employment and Housing and real party in interest Steven Carauddo, collectively referred to herein as "parties" jointly stipulate as follows:

1. Real party in interest Steven Carauddo's motion to Intervene was granted. The Complaint was filed on February 20, 2008. Mr. Carauddo agreed to provide Initial Disclosures by March 21, 2008;

1           2.       The parties requested a previous continuance of the mediation deadline to March 27,  
2 2008 when the real party in interest's motion to intervene was pending;

3           3.       The parties agree that it would be more productive to conduct the mediation after the  
4 parties have pursued some initial discovery;

5           4.       After conferring with Mr. Daniel Bowling of the Court's ADR Department, the  
6 parties and Mr. Bowling agree that the mediation should occur after the disclosures and initial  
7 discovery; and,

8           5.       In order to have sufficient time to complete this initial discovery and providing for  
9 Lucent's counsel having a trial scheduled to commence on April 29, 2008;

10          6.       The parties request that this court extend the date within which mediation must be  
11 completed from the previous date of March 27, 2008 to June 10, 2008.

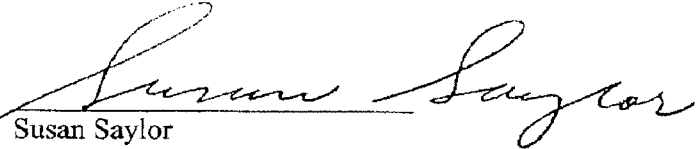
12 **SO STIPULATED:**

13 Dated: 3 / 4 / 0 8

DEPARTMENT OF FAIR EMPLOYMENT  
AND HOUSING

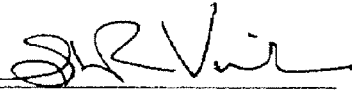
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Senior Staff Counsel

17 By:

18   
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Attorneys for plaintiff, DFEH

1 Dated: 3/5/08

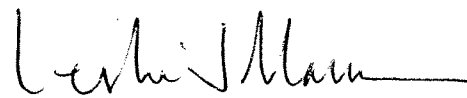
THE VINICK FIRM

2  
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7 Dated: 3/5/08

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13 Leslie J. Mann  
14 Attorney for defendant  
15 LUCENT TECHNOLOGIES INC.

16 **ORDER**

17 The time for completion of mediation, as ordered by the court in its Amended Case  
18 Management and Pretrial Order shall be extended. Mediation shall be completed on or before June  
19 10, 2008.

20 Dated: \_\_\_\_\_

21 \_\_\_\_\_  
22 Honorable Phyllis J. Hamilton  
23 United States District Court Judge  
24  
25  
26  
27

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